

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

In re: Petition of Boston Edison Company,)	
Cambridge Electric Light Company and)	
Commonwealth Electric Company d/b/a/ NSTAR)	
Electric, pursuant to G.L. c. 164, § 94 and 220)	D.T.E. 03-100
C.M.R. §§ 5.00 <u>et seq.</u> , for approval by the)	
Department of Telecommunications and Energy of)	
a new renewable power supply offering.)	

**SECOND SET OF JOINT INFORMATION REQUESTS OF
THE CAPE LIGHT COMPACT AND MASSACHUSETTS
ENERGY CONSUMERS
ALLIANCE, INC.**

Pursuant to 220 C.M.R. 1.06(6)(c), the Cape Light Compact (the “Compact” or “CLC”) and Massachusetts Energy Consumers Alliance, Inc. (“MEC”) hereby submit to Boston Edison Company the following information requests with respect to the above-captioned matter.

INSTRUCTIONS

The following instructions apply to this set of information requests and all subsequent information requests issued by the Compact in this proceeding.

1. “NSTAR Electric” or “Company” means Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company d/b/a NSTAR Electric, its officers, directors, employees, consultants, and attorneys.
2. “Company Filing” or “Filing” means all the documents NSTAR Electric filed in this proceeding.
3. “Filing Letter” refers to the letter from counsel for NSTAR Electric, Robert N. Werlin, Esq., pursuant to 220 C.M.R. § 5.03, that explained the proposed tariff entitled, “NSTAR Green Power Adjustment,” M.D.T.E. No. 110, filed on October 16, 2003.
4. “NSTAR Green” means the tariff, NSTAR Green Power Adjustment, M.D.T.E. No. 110, filed with the Department of Telecommunications and Energy (“DTE” or the “Department”) on October 16, 2003.

5. "Identify a document" or equivalent language means to state with respect thereto:
 - a. The identity of the person who prepared it;
 - b. The identity of the person who signed it or over whose name it was issued;
 - c. The identity of each person to whom it was addressed or distributed;
 - d. The nature or substance of the document with sufficient particularity to enable it to be identified;
 - e. The date and, if it bears no date, the date when it was prepared; and
 - f. The physical location of it and the name and address of its custodian or custodians.
6. "Identify a person" or equivalent language means to state his/her name, last known business and/or home address, phone number and, if employed, his/her job title or position and the name and address of his/her employer.
7. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
8. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
9. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
10. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
11. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
12. If the Company finds that any of these requests is ambiguous, please notify the Compact's attorney Jeffrey M. Bernstein, so that the requests can be clarified prior to the preparation of a written response.

13. Please serve a copy of the responses on the Compact’s attorney, Jeffrey M. Bernstein and the service list in this proceeding.

INFORMATION REQUESTS

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| CLC/MEC 2-1 | <p>In its response to Information Request CLC/MEC 1-8, NSTAR stated that the list of recipients for the Request for Proposals included known participants in the Renewable Energy Certificate market as well as other entities that requested participation in the process.</p> <p>A. Please identify by name each entity that received or requested the Request for Proposals.</p> <p>B. Please provide a copy of all responses received and any correspondence or other documents sent to or received from any entity referred to in your response to A, above.</p> |
| CLC/MEC 2-2 | <p>In its response to Information Request CLC/MEC 1-11, NSTAR clarified its response by stating “at any realistic market penetration.” Please explain in detail how NSTAR defines the phrase “realistic market penetration.”</p> |
| CLC/MEC 2-3 | <p>In its response to Information Request CLC/MEC 1-12, NSTAR stated, “given that NSTAR Green is a new product with uncertain market response, it is in the best interest of NSTAR Electric’s customers to limit the term of any REC supply agreement to one year.” Please explain why NSTAR believes its customers are best served by a one year REC supply agreement, as opposed to a longer term agreement.</p> |
| CLC/MEC 2-4 | <p>In its response to Information Request CLC/MEC 1-14(B), NSTAR stated that the “expected participation level is approximately 1 percent.” Please explain the basis of this projection and provide all documents referred to or consulted in preparation of NSTAR’s response.</p> |
| CLC/MEC 2-5 | <p>In its response to Information Request CLC/MEC 1-21, NSTAR stated that it is in the process of applying for Green-E certification.</p> |

- A. Is NSTAR aware that under Green-E requirements, companies must meet at least a 15% new and 50% renewable energy standard?
- B. Please explain how NSTAR expects to meet this requirement for Green-E certification for the NSTAR Green product.